

Bayer CropScience



To G. R. Darkens

cc B. C. McDavid, J. M. Wey

From N. A. Kimmerle

Tel. (304) 767 - 6829 Fax (304) 767 - 6621

E-Mail Nathan.Kimmerle@bayercropscience.com

Memo

Institute Methomyl-LARVIN Facilitated Self Assessment - 2004

01-10-2005

Attached is the FSA conducted for the Methomyl-LARVIN Unit with the help of Ben McDavid on November 29, 2004 and January 4, 2005. All "Minimum Standards" and "Best Practices" were scored for each section. Minimum Standards were met for 11 of the 16 sections that were scored. Where minimum standards are not met, corrective actions must be taken to improve performance. A written action plan must be developed and the completion of corrective actions must be documented. This report and the follow-up documentation must be kept in the Unit Safety File.

Bayer CropScience
Institute Site
P.O. Box 1005
Institute, WV 25112
USA

Compliance deficiencies identified in the audit are listed below by section. In general, improvement is needed in the areas of safety file management, follow-up to PHA's and audits, management of change auditing, and incident investigation retention and filing. Strong performance was noted in all other categories with many best practices in place.

Section 1 – Safety File Management Systems

- The safety file has not been kept up-to-date.

Section 2 – Employee Participation

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 3 – Process Safety Information – Chemicals

- No Findings – All Minimum Standards met. All Best Practices in place.

Section 4 – Process Safety Information – Technology

- No Findings – All Minimum Standards met. Some Best Practices in place.

Section 5 – Process Safety Information – Equipment

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 6 – Process Hazard Analysis

- Did not document actions to be taken as a result of PHA and Risk Sheet Analysis.
- Did not develop a written schedule of when actions are to be completed.
- Did not assign responsibility for action items.
- Did not communicate status and action completion to affected employees.

Page 2 of 2

Bayer CropScience



Section 7 – Standard Operating Procedures

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 8 – Training

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 9 – Contractors

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 10 – Pre-Startup Safety Review

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 11 – Mechanical Integrity

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 12 – Work Permits

- No Findings – All Minimum Standards met. All Best Practices in place.

Section 13 – Management of Change

- The facility manager did not conduct the required annual audits of the MOCR files.
- Files are missing / out and many that are in place are not properly approved.

Section 14 – Incident Investigations

- Documentation of incident investigations has not been maintained for five (5) years.

Section 15 – Emergency Plans

- No Findings – All Minimum Standards met. Many Best Practices in place.

Section 16 – General or Other Documents

- Not scored - No standards

Section 17 – Compliance Audits

- Did not promptly develop a response plan, in writing, to each of the audit findings, track actions and document that the deficiencies have been corrected from the previous audits.
- The two most recent audits are not on file.

Section 18 – Trade Secrets

- Not scored - No standards

The attached report provides more detail for each section including Best Practices that are in place for the Site and/or the Production Area. If you have any questions, please contact me at Ext. 6829.

Regards,

Nathan A. Kimmerle
Process Safety Coordinator